

November 4, 2012

Bill Grant, Deputy Commissioner
Minnesota Department of Commerce
Division of Energy Resources (DER)
85 7th Place East, Suite 500
St. Paul, MN 55101-2198

RE: MN DG / Net Metering Update

Dear Deputy Commissioner Grant,

I attended the October 11th MN DG / Net-metering workshop and would like to submit the following comments for myself as a citizen and Minnesota resident. I personally support all the DG/ Net-metering comments by MRES submitted to you today. While I believe that the MRES Board would probably have approved the addition comments of my herein as well, there was not time in my schedule for me to discuss and add them and also get the MRES Board approval by the extended deadline today.


I would like to say that with the proposal of including a 10% Solar Electric Standard (SES) with a "Buy-All / Sell-All" dual metering program and using a value and price of solar mechanism similar to the Austin Energy *Distributed PV calculator* makes sense. However, in light of the fact that the adoption rate of Distributed Generation (DG) in Minnesota is only 0.03%, including solar photovoltaics (PV), it may seem impractical to stakeholder to expect a 10% SES adoption level in the next 6 months. However, if an incentive, such as "Solar*Rewards" or "Minnesota Bonus Rebate," or other additional statewide incentive, were included with a premium utility buy price in a "Buy-All Sell-All" program, it should accelerate the adoption rate toward 10% SES, provided that the utility buy price were appropriately set by a model like the Austin Energy *Distributed PV calculator*. In addition, it may also be practical to set stepped goals to scale-up to 10% of the Minnesota utilities generation, either purchased or self-generated, over a longer period of time than just one year.

I understand that the *Solar Works for Minnesota Coalition* have been discussion the idea of scaling up in steps to a 10% SES over some time, and I personally support them and their good work.

Of course there are many details that are not included in a workable solution to updating the net-metering regulations for needed for adequate DG; however, I believe that that best be left to a negotiation between DER and the stakeholders under the framework I've suggested and MRES has submitted in its comments to you.

Thank you for considering my own comments and the opportunity to participate in the DG workshops.

Sincerely,

A handwritten signature in black ink that reads "Jan Hubbard". The signature is fluid and cursive, with the first name "Jan" and last name "Hubbard" clearly legible.

Jan Hubbard
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